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July 6, 2017

Via ECF

Honorable Renee Marie Bumb, U.S.D.J.
United States District Court for the
District of New Jersey
Mitchell H. Cohen Courthouse
4th & Cooper Streets
Courtroom 3D
Camden, New Jersey 08101

Re: Joseph Cobb v. Ardagh Glass Inc., et al.
Civil Action No. 1:17-cv-04399

Dear Judge Bumb:

This firm represents Defendants Ardagh Glass Inc. (improperly pleaded as “Ardagh Glass, Inc. d/b/a/ Ardagh Group”), John McLarty, and James Strahan (collectively, “Defendants”) in the above-referenced matter. We respectfully request an extension of fourteen (14) days of the current deadline for Defendants Ardagh Glass Inc. and John McLarty to answer, move or otherwise reply to the Complaint filed by Plaintiff Joseph B. Cobb, III.

Presently, the time within which Defendants Ardagh Glass Inc. and John McLarty must answer, move or otherwise reply to the Complaint will expire on July 7, 2017. Defendants Ardagh Glass Inc. and John McLarty were served with process on May 17, 2017, and a notice of removal to this Court was filed on June 16, 2017. Pursuant to Orders entered by the Clerk in accordance with Local Rule 6.1(b), the time for Defendants Ardagh Glass Inc. and John McLarty to respond to the Complaint was extended by fourteen (14) days until July 7, 2017. No other extensions of time to respond to the Complaint have been requested.¹

At this time, Defendants request a modest extension of time up to and including July 21, 2017 to further consider the Complaint, investigate the allegations contained therein, and respond accordingly. We have conferred with Plaintiff’s counsel, who consents to this request.

¹ Counsel accepted service of process on behalf of Defendant James Strahan on June 26, 2017. A Waiver of the Service of Summons was filed on behalf of Mr. Strahan on July 5, 2017, thereby extending until August 25, 2017 Mr. Strahan’s time to answer, move or otherwise reply to Plaintiff’s Complaint. Accordingly, the extension being requested herein is sought only with respect to Defendants Ardagh Glass Inc. and John McLarty.

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Thank you for your time and attention to this matter.

Respectfully submitted,

s/Paul D. Erian
Paul D. Erian

cc: Daniel Kurkowski, Esq. (via ECF)